

REMARKS

This communication is responsive to the Office Action mailed February 6, 2007 and filed with an RCE included herewith.

The Office Action reports that claim 1 was rejected as being obvious over Barclay (U.S. 5,960,399) in view of Brown (U.S. 6,587,822).

Barclay is cited for disclosing a server/client system for processing speech data comprising a web server, a client device and a recognition server, but it is acknowledged that Barclay does not disclose a second client device configured to record speech data and adapted to send speech data to the recognition server, wherein the second client device comprises a telephone and a voice browser. Brown is cited for disclosing such a device.

In particular, it is reported:

Barclay does not appear to expressly disclose a second client device similar to the first client device (70). However, the server (80) is an Internet web server (abstract, column 9, line 1), which implies that there are multiple remote clients.

...  
Barclay therefore teaches a second client device (another device 70)....  
...

Barclay does not teach or-suggest a client device (70) having a telephone and a voice browser capable of rendering the information from the web server audibly. So, Barclay does not teach that the implied second client device has a telephone and a voice browser capable of rendering the information from the web server audibly.

Barclay's clients are just standard personal computers (figure 1; column 4, line 57 et seq.) Equipping a standard PC with a telephone and a voice browser capable of rendering information from a web server was well known in the art, as evidenced by Brown.

In a similar art, Brown teaches a PC (IVR platform 102 implemented using a PC) (column 4, lines 38-41) having

a telephone (108) (column 3, lines 10-11) and a voice browser capable of rendering information from a web server (column 3, line 53 et seq.) Providing a PC with such a telephone and **voice** browser has advantages such as enabling clients to conveniently access web pages using an audio interface. Therefore, it would have been obvious to provide the second client with such a telephone and voice browser in the instant case.

Applicant respectfully disagrees that the cited combination of Barclay and Brown teach the invention recited by claim 1 because Brown is being summarily held out as showing a voice browser and phone, but the complete context in which these devices are being used is being ignored. Clearly, from FIG. 2. of Brown the voice browser 110 is present in the IVR platform 102, but more importantly, the IVR platform 102 also includes a speech recognizer 122. It is this combined system, that is adapted to receive input from a user using a device 108, which can be a telephone in order to access and render websites from servers 106-1 through 106-N. Thus, Brown teaches that to serve audio devices like telephones one uses an IVR platform that includes a voice browser and a speech recognizer. This construction does not teach, and in fact teaches away from the language recited in claim 1, i.e. wherein the second client device includes a voice browser but "the second client device is adapted to send the input speech data to the recognition server remote from the second client device."

It is therefore submitted that the combination of teachings found in Barclay and Brown would not teach or suggest the invention as recited in claim 1, but rather a system having a speech recognizer 80 as found in Barclay to serve PCs having visual browsers, while audio devices such as telephones would be served by an IVR platform having both a voice browser and a speech recognizer, a system where not only two speech recognizers are present, but also where the voice browser and the second speech recognizer are together. Clearly, the invention of claim 1

is not only patentably distinguishable, but in many respects superior by eliminating at least one speech recognizer.

In view of the foregoing, amended claim 1 is believed allowable. Dependent claims 8, 9 and 14-25 depend directly or indirectly from claim 1 and are believed separately patentable.

Claim 26 was also rejected based on the combination of Barclay and Brown. Claim 26 has features similar to claim 1; however, this claim has been further amended to recite that a wide area network is present operatively connecting the recognition server, web server, first client device and second client device (which has a browser). Thus, this language further clarifies that the second client device is clearly remote from the recognition server and the browser. For these reasons and the reasons provided above for claim 1, which are applicable to claim 26, claim 26 is believed allowable and dependent claims 27-30 are believed separately patentable, and thus, also allowable.

Likewise, for the reasons discussed with respect to claim 1, claim 34, which recites a method for processing input data in a client/server system, is believed allowable, while dependent claims 36-39 are believed separately patentable and allowable.

The foregoing remarks are intended to assist the Office in examining the application and in the course of explanation may employ shortened or more specific or variant descriptions of some of the claim language. Such descriptions are not intended to limit the scope of the claims; the actual claim language should be considered in each case. Furthermore, the remarks are not to be considered exhaustive of the facets of the invention which are rendered patentable, being only examples of certain advantageous features and differences, which applicant's attorney chooses to mention at this time. For the foregoing reasons, applicant reserves the right to submit additional evidence showing the distinction between applicant's invention to be unobvious in view

of the prior art.

Furthermore, in commenting on the references and in order to facilitate a better understanding of the differences that are expressed in the claims, certain details of distinction between the same and the present invention have been mentioned, even though such differences do not appear in all of the claims. It is not intended by mentioning any such unclaimed distinctions to create any implied limitations in the claims.

An extension of time is hereby requested for consideration of this Amendment. A charge authorization is included herewith for the extension of time fee.

In view of the foregoing, reconsideration of the application as amended is requested. Favorable action upon all pending claims is solicited.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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